

MINUTES OF THE AGENCY
OCCUPATIONAL SAFETY AND HEALTH COMMITTEE MEETING
6 June 1988, 2:00 p.m.

	In attendance were:
25 X 1	
,	
25X1	
(3 / 1	1. welcomed the attendees and noted the AOSiIC
	could almost be called the "Smoking Committee" with several calls a week concerning smoking complaints and considerable work evaluating
SEVA -	Designated Smoking Area (DSA) requests. In response to
25 X 1	remark that was to prepare an Employee Bulletin on the smoking regulation, said she
25 X 1	was not aware of this, that would be returning to
25 X 1	the office Wednesday, and she would remind him of this. said he would call on Thursday, 9 June, about
.5/ 1	this.
25 X 1	
	2. advised the members of the Committee that he had requested a ventilation evaluation of the restrooms and the
25 X 1	areas for which DSA requests had been submitted
25 X 1	Reports of the ventilation of these areas (Reston Ventilation Study (RPVS)) had been received and these reports,
	along with surveys of concerned areas, enabled the development of
VEX.4	recommendations on these mattters for the Committee's review. A
25 X 1	discussion of the and other DSA requests is outlined in the
	following paragraphs: ្រើបារា គ្រោះគ្រោះ
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25 X 1	
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25 X 1	
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	considerable discussion about whether or not "No Smoking" signs
	were up, the penalties to be issued following first thru fourth
	violations, and whether or not an employee could file a
25 X 1	grievance against an Agency policy matter made a motion that the memo be approved, as written. The motion was
	approved.
٠.	
25X1	E. 2B44 Hdgs work area: The Committee reviewed the 8 Mar 88 memo to frm (attached). A
	diagram of the office layout (attached) was displayed.
25X1	noted the configuration was not satisfactory
25 X 1	for a DSA. made a motion that this area not be approved for a DSA. The Committee approved the motion.
	approved for a box. The committee approved the motion.
25 X 1	F. 2C42, Hdqs work arearequest for
	determination of a DSA). A diagram of the office layout (attached) was displayed. The Committee recommended
	disapproval of the File Room as a DSA, and approval of the
	Secretary Panel Room and Panel Room A as DSAs, only when not
•	occupied by panels. There were no objections.

	G. GAIS Stailway: Reference was made to the attached
25 X 1	25 May 88 memo to It was
*	noted that GA20 is the stairwell and GA13 is the Security
	Conference Room. The Committee was in agreement with
25 X 1	
	memorandum, thus' a motion was made to approve
25 X 1	the memo. There were no objections. will also
	communicate with C/SEG/OS and request he/she advise the
	conferees and teaching staff in GA13 of the DSA rules.
	conferees and teaching staff in GATS of the BSA fules.
	H. Smoke-filled DSA Restrooms: Reference was made to
25X1	5 Apr 88 memo to
25 X 1 25 X 1	•
20/1	2 May 88 memo to EHPMO. recommended extending
	the ductwork and adding exhaust tans because he doesn't think
	louvered doors will as expeditiously remove smoke from the
25 X 1	restrooms. made a motion that
_0/(1	
	recommendation be approved; the Committee approved the motion.
25 X 1	said he would advise in writing of
-0, ()	this decision.
	Child Goldson.
	I. New Hdqs Bldg: The attached list of smoking and
	non-smoking restrooms in the New Hdqs Bldg was reviewed by the
25 X 1	Committee. moved that the Committee accept the
_0,(1	lists there were no chiestians
	list; there were no objections.
75V4	
25 X 1	
25 X 1	to 18 May 88 memo to
	10 May 00 memo co
25X1	
23/1	1) First, a diagram of the cafeteria
	(attached) was displayed. The Committee agreed with and
25 X 1	approved memo regarding DSAs in
	cafeteria.
25 X 1	2) Second, a diagram <u>of the</u> cafeteria
25 X 1	(attached) was displayed. made a motion that
25 X 1	memo, which states the DSAs should be
	separated and the ductwork extended, be approved. The
	Committee approved the motion.
	Communication of the communica
	7 Describes the approach mublication of a UNI on the AOSUC
	3. Regarding the proposed publication of a HN on the AOSHC,
25 X 1	which listed the members from various offices,
	pointed out that one management and one employee representatives
	should serve on the Committee from each of the Directorate elements
	listed in the notice.
	· · · · · · · · · · · · · · · · · · ·
25 X 1	4. 6 Nov 87 memo, Subject: Enforcement of
	4. Devilation Committee Destruction Convince American
	Smoking Regulation, Security Protective Service, was discussed.
	The Committee members, for the most part, think employees have
	complied with the Hdqs Regulations on smoking; the few violations
	that have occurred were not serious threats to the health of
	that have occurred were not serious threats to the hearth of
	employees; and it was believed the enforcement of the smoking

25X1	25 X 1	regulation should be kept in the supervisory/management channels as opposed to the Security Protective Service channels. asked for a show of hands as to how many were opposed to having the SPO's enforce the regulations (count of 8), and how many want the SPO's involved (count of one). Thus, the Committee will not request consideration of assistance from the SPO's for limited circumscribed assistance referrable to the Smoking Regulation.
inordinate amount of time dealing with smoking matters and he wondered whether or not it wasn't time to take the next step and totally ban smoking in Agency buildings. reported he had talked with Dr. McGinnis at IHS three months ago and HiS had started at that time a total ban on smoking to take effect over 90 days. The Committee seemed receptive to this idea and requested to ask to look into the legal aspects of a total smoking ban in the Agency. welcomed this and also again requested to ask to finish his draft of an Employee Bulletin on the Agency Smoking Policy and its enforcement. 8. The Committee members had no new business to report. advised that Gary Foster, D/MS, had asked to ask the Committee's opinion on making one	25X1	vending machines from Agency buildings. The Committee needs to Agency Buildings. The Committee didn't take any further action on
25X1 wondered whether or not it wasn't time to take the next step and totally ban smoking in Agency buildings. reported he had talked with Dr. McGinnis at IIHS three months ago and HdS had started at that time a total ban on smoking to take effect over 90 days. The Committee seemed receptive to this idea and requested to ask to look into the legal aspects of a total smoking ban in the Agency. welcomed this and also again requested to ask to finish his draft of an Employee Bulletin on the Agency Smoking Policy and its enforcement. 25X1 8. The Committee members had no new business to report. advised that Gary Foster, D/MS, had asked to ask the Committee's opinion on making one	25 X 1	
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to ask the Committee's opinion on making one	25 X 1	advised that Gary Foster, D/MS, had asked
		to ask the Committee's opinion on making one

was noted that the South Cafeteria allows cleared people only, while the North Cafeteria is the only one that can be used by contractors and visitors. It was thought by the Committee it wasn't appropriate at this time to limit smoking to just one cafeteria. The Committee decided to table this item for now.

9. The meeting was convened at 3:45 p.m.

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Attachments

- A These had been handed out to each member upon their arrival at this meeting
- B Diagrams of the areas discussed concerning whether or not to approve any DSAs

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17 May 1988

25 X 1	
	MEMORANDUM FOR:
	Chief, Adminstrative Staff/FBIS
25.74	
25 X 1	FROM:
	Chairman, Agency Occupational Safety and
	Health Committee (AOSHC)
	SUBJECT: Designated Smoking Area Requests
	1. In our meeting on 5 May 1988 to review the Designated
25 X 1	Smoking Area (DSA) requests for we reviewed the
	Smoking Room Survey and Building Ventilation Study report of
25 X 1	28 March 1988, prepared by and the 14 December 1987
	report of the restroom ventilation, prepared by Real Estate and
1	Construction Division (RECD)/OL.
	2. Since the following areas do not have ventilation to
	support a DSA in the winter, and the temperature and ventilation
25X1	system in Building doesn't have an established start and
	finish date for winter and summer operation, you decided to
	withdraw your requests for these areas to be DSAs:
	1 N 45 3 S 10
	1 S 29C 1 N 07
	3. The one work area that does have ventilation satisfactory
	to support a smoking area is the breakroom established for this
-	purpose in 3 N 19. It could support four smokers in the summer
25 X 1	operation and one smoker in the winter operation.
25X1	and I visited this room. I noted the
	following:
	A. The ashtrays were full of cigarette butts and ashes.
	B. There was a circa 2-inch gap at the bottom of the door
	B. There was a circa 2-inch gap at the bottom of the door.C. There were two Pollenex Pure Air 99 air cleaner units
	operating on the floor.
r	D. No one was using the room during our visit.
	E. There was no smoke in the air, but one could smell the
	odor from the filled ashtrays.
25 X 1	
20/\ I	

I suggested the tobacco odor could be lessened if the ash trays were emptied a couple of times during the day and the material removed by the custodial staff.

- 4. We left the room and in the hallway talked with a male employee who complained that employees in the adjoining offices in which he worked were getting smoke and tobacco odor from the 3 N 19 breakroom. I requested he write a memorandum concerning this to you.
- 5. We returned to the 3 N 19 breakroom.

 Certain whether the ventilation modification to this room exhausted the air to the outside of the building or just returned it for recirculation. I requested he ascertain this information. If the air is not exhausted to the outside, I recommended he request this be accomplished. I also suggested the following things:
 - A. I again recommended the periodic emptying of ashtrays and also waste baskets.
 - B. I told Ed I didn't think the Pollenex units were on a list of acceptable air filters that SD/OMS had compiled, but I would check this and give him a list of acceptable units. I recommended the air cleaners be mounted on the side walls near the ceiling, as smoke normally rises and they should be more effective near the ceiling. A list of acceptable units is found in Attachment A.
 - C. I suggested closing the gap at the bottom of the door between the nonsmoking and smoking areas of the breakroom.
 - D. I recommended consideration of installing an exhaust fan in one of the outlet openings in the ceiling to help accelerate the removal of smoke from the DSA. If this is installed, then it would probably be appropriate to leave the gap under the door so negative pressure would develop in this area.
 - E. I recommended posting DSA signs in the smoking area of the breakroom and "No Smoking" signs in the nonsmoking area of the breakroom. These signs can be obtained from
- 6. In light of the above information, it appears the suggestions in paragraph five need to be implemented before unlimited smoking can be permitted in the DSA of the breakroom. Until these things are accomplished, it appears, according to the 28 March 1988 ventilation report, that no more than one smoker can be permitted in this area during winter HVAC operation and four smokers during summer HVAC operation.

25X1

	/. I reported it appeared all the restrooms have ventilation
,	that would permit them to be DSAs. It is my understanding that you
	wish to have the restrooms of the first and third floors of
25X1	to be DSA restrooms and the restrooms on the second
	floor to be nonsmoking restrooms.
	11001 to to monomial to the control of the control
25X1	8. I mentioned when and I entered a person
	was smoking between the two sets of glass doors. You advised that
	this area, and the area outside the badge machines, belongs to
	RECD/OL and not to you. In view of this, I will write a memo to
25X1	RECD/OL requesting appropriate signs and receptacles be placed at
23/1	the entrance of the Buildings.
	O A Ab
	9. As you know, the above will be discussed at the next Agency
	OSHC meeting. Once the Committee has decided on positions on these
	matters, I will advise you of the Committee's decisions by written
	memorandum.
25X1	
	Attachment
•	
	cc: <u>C/SD/OMS</u>
25X1	Security Ofcr/FBIS
25X1	
/	
	C/RECD/OL

16 May 1988

	MEMORANDUM FOR:	Chief, Real Estate and Construction Division Office of Logistics
STAT	FROM:	
		Chairman, Agency Occupational Safety and Health Committee (AOSHC)
STAT	SUBJECT:	
	REFERENCE:	Designated Smoking Area Requests Memo dtd 16 May 88 to C/Admin Staff/FBIS
STAT	<u></u>	, when Chief, Safety Division/OMS,
STAT	and I entered cigarette by an a	we noted a lady smoking a
STAT	Staff/FBIS, he ad outside the badge	o signs indicating there is "No Smoking Except in Chief, Admin vised us that the area between the doors and machines is under the control of Real Estate and
STAT	regulation Divi	sion/OL. In light of this, a copy of the Agency is attached for your information. In this regulation, it is requested that appropriate
STAT	that appropriate	receptacles be placed outside the entrances of
STAT	enter	may discard their lit tobacco products before they Your assistance in these matters will be ed. I would appreciate being advised when these completed.
STAT		
	Attachment	
OT 4 T	cc: C/Admin Staf C/Management C/SD/OMS	F/FBIS Svcs Grp/OD&E/DS&T
STAT		

8 March 1988

STAT	MEMORANDUM FOR:	
		Chief, Counterintelligence Support Staff
STAT	FROM:	Chairman, Agency Occupational Safety and Health Committee (AOSHO)
	SUBJECT:	Smoking Complaint

- 1. In response to your request, I evaluated the office configuration and ventilation of the 2B44 work area on 3 December 1987. I noted two return air vents in the central open work area (COWA). There were no return air vents in the individual offices around the periphery of the COWA. Thus, whenever anyone were to smoke in the 2B44 complex the smoke would need to go into the COWA to be removed. This in essence makes the entire complex an open work area and smoking is not permitted in open work areas by the Agency regulation on smoking.
- 2. If an employee occupying an individual private office adjacent to a return air outlet were able to restrict his/her smoke through the use of a smokeless ashtray, an air filter, and direct exhaust of the smoke into the return outlet so that the smoke wouldn't cause any irritation to other employees in the work area, it is possible an individual office could be made a designated smoking area (DSA). Since an employee in the open work area is already experiencing irritation from smoke coming from one of the individual private offices, I am not very optimistic about the above being attainable.
- 3. In the one room occupied by two employees where one is a smoker and the other is not, it is not permissible for this to be a DSA.
- 4. In summary, based on the ventilation configuration in 2B44, none of this area appears acceptable to be a DSA. I will provide a report of my findings at the next AOHSC meeting, and if the Committee acts as it has in the past, I believe it will support my recommendations. I will advise you of the Committee's decision after the next meeting.

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25 May 1988

STAT	MEMORANDUM FOR:	Deputy Chief, FMD/OL	
STAT	FROM:	Chairman Agaray Osaynatianal Safa	
*		Chairman, Agency Occupational Safe Health Committee (AOSHC)	ty, and

SUBJECT:

1. As a follow-up to our phone conversation today, I have received complaints from four different Agency employees in the past three weeks about individuals smoking in the GA13 stairway in violation of the Agency regulation on smoking. In light of this, I went to the GA13 stairway on Friday, 20 May. No one was smoking in the stairway at the time of my visit, but there were cigarette butts in a wall-mounted ashtray/waste disposal container in the stairway and a faint odor of smoke. In view of the reported repeated smoking violations in the GA13 stairway, I would appreciate your arranging for "No Smoking" signs being placed in the GA13 stairway and adjacent hallway.

Repeated Smoking Violations in the GA13 Stairway

2. Because I noted the wall-mounted ashtray/waste disposal unit in the GAl3 stairway, I decided to visit other stairways and elevator areas. In doing so, I noted similar units are mounted on the walls on each floor in the stairways and by the elevators. With the current policy on smoking, which prohibits smoking in open areas, I think the ashtray portion of each of these wall-mounted units should be covered/inactivated/disassembled, the current units should be replaced with new single waste disposal units, or "No Smoking Except in Designated Smoking Area" signs should be mounted by these current units. I would appreciate your thoughts on this matter. I plan to bring this matter up for discussion at the next Agency Occupational Safety and Health Committee meeting on 6 June 1988.

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5 April 1988

TAT	MEMORANDUM FOR:	Chief, Fac	cilities Mana	gement Divisi	on/OL
STAT	FROM:	Environme Officer	ntal Health a (EHPMO/OMS)	nd Preventive	Medicine
÷	SUBJECT:	Smoke-fil	led Designate	d Smoking Are	a Restrooms
	REFERENCE:	17 Mar 88 Untidy	Memo frm Ads Ladies Restro	e on Smoke-fi om in GH30	lled and
	reference propose the Headquarters these restrooms. of the estimated this is a very was agency employees in providing a heat you will be to complete this	al to exten smoking re OMS is wi cost of \$1 orthwhile e to environ lealthy work able to fi task.	d the exhaust strooms to as ling to comm 3,000 to accondeavor to he mental tobacc place for Agend the other	it half the memory it half the memory employees half of the memory employees	ring smoke from noney (\$6,500) OMS thinks the exposure of thereby assist is hoped nonies required
	2. OMS furt small exhaust fa homes in the ope and accelerating	ns, similar	to those use	1 PM 10 X \ \ 1 \ 1	is in private in enhancing
	3. Please k praiseworthy pro \$6,500 when it is completed.	·	C ic brabated	levelopments i l to provide a can be fully	1 2420 101
STAT					_ ·
		ė.			
	cc: D/MS DD/MS C/B&F/OMS			- <u>)</u> ;	

ALMINISTRATIVE-INTERNAL USE; ONLY

2 May 1988

MEMORANDUM FOR:	Environmental Health and Preventive Medicine Officer, OMS
FROM:	Chief, Facilities Management Division, OL
SUBJECT:	Smoke-filled Designated Smoking Area Restrooms
PEFFPFNCF.	Your memo dtd 8 Apr 88 to C/FMD/OL Same Subject

- 1. In order to reduce the cost of extending exhaust systems to all foyers of smoking restrooms in Headquarters, Facilities Management Division (FMD) is testing an alternate solution involving door louvers. If this solution produces acceptable results, the construction cost will be reduced to \$6,200.00.
- 2. The Office of Medical Services will be advised as soon as the test results are available and FMD has conducted an engineering evaluation.

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OL 10158-88

11/17/87

This following is a list of Smoking/No Smoking Restrooms for the New Headquarters Building:

SMOK	ING REST ROOMS	NO S	MOKING	REST	ROOMS
			•		
GT66	Women	GS24	Women	4	
GT62	Men	GS28	Men		
	Women	1T50	Women	*	
1S78	Men	1T46	Men		
2 T 4 4	Women	2570	Women		,
2 T 4 0	Men	2574	Men		
3 S 7 2	Women	3 T 3 6	Women		
3 S 7 6	Men	3 T 3 2	Men		
4 T 3 6	Women	4 S 7 2	Women		
4 T3 2	Men	4576	Men		
5516	Women		Women		
5S20	Men	5T40			
6 T 4 4	Women	6516	Women	٠.	
6T40	Men	6 S 2 0			

18 May 1988

MEMORANDUM FOR:

C/EBOB/RECD/OL

STAT

FROM:

Chairman, Agency Occupational Safety and

Health Committee (AOSHC)

SUBJECT:

Designated Smoking Area (DSA) Evaluations

STAT

- 1. Pursuant to our previous conversation about setting aside a DSA in the cafeteria, we visited the cafeteria to determine what had been done. We observed a "Smoking Area" sign on the far wall by the windows, but there was no clear demarcation between the DSA and the remainder of the cafeteria which is to be nonsmoking. I suggested the tables and chairs be rearranged so that 25-30% of the tables and chairs be set aside as the DSA, in the area farthest from the entrance and serving line by the windows. There should be an isle/passageway separating the DSA from the remainder of the no-smoking area of the cafeteria. To help avoid confusion, "Smoking Area" signs could be placed on the tables in the DSA and "No Smoking" signs on the tables in the no-smoking area. A "No Smoking" sign could also be placed on the walls in the no-smoking area of the cafeteria, so it is clear that the smoking area marked by the existing sign on the wall is a limited area.
- 2. If employees complain that individuals are not observing the above restrictions, the cafeteria staff should inform individuals of the requirement to restrict smoking to the DSA.
- 3. Following this, Chief, Safety Division/OMS surfaced a hand-written note from DC/SD/OMS concerning a smoking problem in FND/SAG/Commo in the 1C-15 area. On visiting this area, we found numerous individual offices occupied in many instances by two employees, and an open area in which a number of secretaries sit. I found three individual offices, occupied by two individuals each, in which at least one individual smoked; I reviewed the Agency

smoking regulation with them, advising the smokers that it is not permissible for these types of offices to have smoking in them without it having been reviewed and approved by the AOSHC. It was noted the C/FND has a private office and is a smoker. We observed another private office in which the occupant was apparently a pipe smoker, and a visitor to the office was smoking a cigarette. We further observed that it appeared air is removed from the entire area around the ceiling lights and into a return air plenum.

- 4. We met for a short period with the C/SAG/FND about the reason for our visit, and the observations we had made up to that time. I offered to send a copy of the smoking regulation to him and requested his assistance in ensuring the regulation is properly observed.
- Next we visited and inspected the third floor ladies' Building. The restroom did not have an odor of or visible smoke in it or in the adjacent hallway at the time of our visit. We noted air is coming into the restroom through an inlet and exiting out a return air outlet. We thought some air was entering the restroom from the adjoining hallway, through louvres over the archway of the entry door. It would be appreciated if you would have the ventilation in this restroom measured and ensure that it is performing in conformance with, or better than its design standards. We also discussed the status of this restroom with two employees in the area and learned they apparently use it, even when it has smoke in it. We pointed out they could use the elevator to go up or down one floor to a no-smoking restroom. Because it is more convenient to use the third-floor restroom, they apparently do this even if it is full of smoke. I advised these employees we would have the ventilation of the restroom evaluated and ensure it is performing to design standards. If this doesn't totally eliminate the problem of smoke, and they still find it objectionable. I suggested they use the non-smoking restrooms of the second or fourth floors.
- 6. Finally, we visited the cafeteria. We observed ashtrays full of cigarette butts throughout the cafeteria and one person actively smoking. There were no signs indicating a no-smoking area or a DSA. After observing the air inlets and outlets, and the expected flow of cafeteria patrons, it appeared 25% of the tables and chairs should be established as a DSA in the corner of the cafeteria by the windows and adjacent to the wall that extends to the entry to the cafeteria. The DSA should be separated by an isleway from the non-smoking tables. It would be appropriate to have "Smoking Area" signs on the tables and the wall in the DSA and "No Smoking" signs on the tables and walls of the no-smoking area. To facilitate the removal of smoke without intrusion into the no-smoking area, it is requested the existing return air ductwork be extended over to the DSA.

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7. I want to thank you for accompanying the C/SD/OMS and me on the visits to the above four areas and will appreciate your assistance in accomplishing the things we discussed and which are covered in the previous paragraphs.

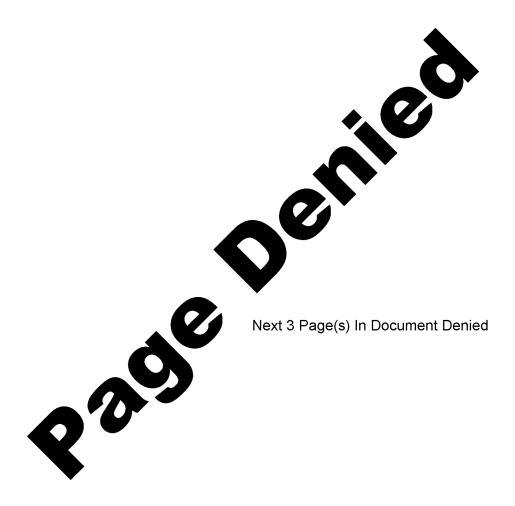
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cc: C/SD/OMS Nurse,

		C ~ ~ ~
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	Service and the service and th	

3 June 1988

	MEMORANDUM FOR: Chief, Regulatory Policy Division, DDA
<i>1</i> 4	MEMORANDOM FOR: Chief, Regulatory Folicy Division, DDA
(1	FROM: Executive Officer/OMS
	SUBJECT: Publication of Headquarters Notice
(1	1. It is requested that the attached draft Headquarters Notice entitled "Agency Occupational Safety and Health Committee" be published as an ALL EMPLOYEES (1-6) notice. This notice updates Headquarters and dated 4 February 1987, which expired 1 September 1987.
1	2. If you have any questions, please contact me on
1 .	
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1	
	Attachment
	Accuentment.
	cc: C/SD/OMS
(1	



ADMINISTRATIVE - INTERNAL USE ONLI
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OCC-87-53115 6 November 1987

STAT	MEMORANDUM FOR	Chairman, Occupational Safety and Health Committee
	THPOUGH:	Associate Deputy General Counsel for Administrative Law and Management Support
STAT	FROM:	Management Support Division/OGC
	SUBJECT:	Enforcement of Smoking Regulation, Security Protective Service
STAT	REFERENCE:	Memo from Office of NIO/GPF; for Chairman OSHC: Subject: Smoking in Corridor

l. This is in response to your request concerning the legal implications of the Agency directing the Security Protective Service (SPS) to enforce Agency restrictions on smoking in corridors and food service areas. Such enforcement by the SPS would not be legally objectionable, but we do have certain concerns regarding the implications of SPS involvement, which are discussed in paragraph 4.

and Food Service Areas; dated 13 November 1987

2. According to the reference, under current policy Security Protective Officers (SPOs) do not enforce the Agency's smoking restrictions. Under the proposed policy, however, when a SPO observes an individual in an Agency facility violating the smoking regulation that officer would request the violator to comply with the regulation. If the individual did not so comply, the SPO would note the individual's badge number. Then, the fact the individual violated an Agency regulation would be disseminated to the violator's supervisor. No further action would be taken by the SPO and SPOs would only enforce the regulation with respect to infractions observed at their posts, i.e., they would not seek out violators in response to complaints by other employees.

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- 3. There is no legal objection to the Director of Security instructing the SPS to enforce the smoking restrictions, as set forth in paragraph 2. We would suggest, however, that be amended to reflect this new obligation, setting forth the extent to which the SPS will enforce the restrictions (e.g., not seek out violators) and the manner in which willful noncompliers would be dealt with. We also suggest that prior to the policy being implemented, all Agency employees be advised of the policy in an employee bulletin or other appropriate mechanism.
- 4. Although the policy would not be legally objectionable, we do have several concerns. Whenever the authority of an armed officer, with law enforcement powers, is directed at an individual it invariably appears to that individual that law enforcement authority is being invoked. We question whether this is appropriate with respect to non-security oriented administrative regulations dealing with issues that really are management concerns. Moreover, whenever an officer confronts an individual violating a regulation, there is a possibility for the confrontation to escalate. This may result in the SPO being distracted from his or her primary mission. Finally, confrontations between SPOs and violators who ignore the SPO's request could often result in the violator walking away while still smoking, which might tend to undermine the SPO's general authority.

5.	If you ha	ave any	questions,	please	call	me	on	secure	
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